



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

LS  
F. #2024R00485

*271 Cadman Plaza East  
Brooklyn, New York 11201*

August 8, 2025

By ECF and E-mail

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Re: United States v. Jacob Israel Walden  
Criminal Docket No. 24-521 (GRB)

Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, enclosed please find the government's production of additional discovery in the above-captioned case. The discovery has been transmitted by USAfx, a file-sharing system. Please promptly download the materials and confirm in writing to the government that you were able to do so. The government also requests reciprocal discovery from the defendant.

Please note that, as before, the enclosed material is considered Sensitive Discovery Material ("SDM") as that term is defined in the January 24, 2025 Protective Order in this matter. See ECF No. 40. As such, PDF files containing SDM have been marked as "Sensitive" on each page, and non-PDF files have been marked as "Sensitive" in the corresponding file folder or filename.

I. The Government's Discovery

A. Documents and Tangible Objects

Please find enclosed the following additional materials:

- The “subject record” for the Defendant, which is Bates-numbered DOJ\_0000969-DOJ\_0000981.
- The “silent hits” related to the Defendant’s travel between the creation of the subject record and his arrest, which are Bates-numbered DOJ\_0000945-DOJ\_0000968.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

JOSEPH NOCELLA, JR.  
United States Attorney

By: /s/ Leonid Sandlar  
Leonid Sandlar  
Trial Attorney  
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Enclosures (via USAfx link)

cc: Clerk of the Court (GRB) (by ECF) (without enclosures)